



Inc. 1910

Public Works

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Jason McDermott
Regional Compliance Officer
Idaho Falls Regional Office
Department of Environmental Quality
900 N. Skyline Drive
Idaho Falls, ID 83402

November 30, 2020

RE: Compliance Evaluation Inspection: IPDES ID0020141 (City of Driggs)

Mr. McDermott,

The letter is in response to the Evaluation Inspection letter received November 2 via email for the September 1-2, 2020 compliance inspection of our wastewater facilities referenced above. This letter is being sent via email and submitted through the IPDES E-Permitting system.

The September 2020 inspection of our wastewater facilities identified three violations of our IPDES permit. Our corrective actions for each violation are outlined below in red. The city takes these violations seriously and appreciates the Department of Environmental Quality working with us to correct them.

1. *Part II.B.2 of the Permit states, "Permittee must use the EPA-approved QA/QC and chain-of-custody procedures..."*

It is a violation of the Permit that the chains of custody are not being filled out completely. The Permittee must take corrective action to address the missing information on the chains of custody no later than 12/20/2020. Documentation identifying the corrective action must be submitted to DEQ through the IPDES E-Permitting system.

Corrective Action: Upon verbal notification of this violation, the chain of custody form was updated to increase the available chain-of-custody lines. Additionally, a staff meeting of all public works employees was held to train them on the chain-of-custody procedures. An updated chain-of-custody form is attached and proper "hand off" procedures were followed starting after September 2, 2020.

2. *Part I.B Table 1 Footnote 1 of the Permit states, "The average monthly E. coli counts must not exceed a geometric mean of 126/100 ml based on a minimum of five samples taken every 3-7 days within a calendar month."*

It is a violation of the Permit that the City takes E. coli samples at a sample frequency that is out of the scope of the Permit.

The permittee must immediately begin taking all E. coli samples as outlined in their Permit and at the frequency identified in Table 1, Footnote 1. documentation identifying how the City is meeting their Permit sampling requirements for E. coli must be submitted to DEQ through the IPDES E-Permitting system by 12/20/2020.

Corrective Action: Upon verbal notification of this violation, the city began sampling E.coli a minimum of weekly sometimes twice per week and transporting the sample to Teton Microbiology Laboratory, located in Idaho Falls (1.25hrs each way), to satisfy the new interpretation of the permit language.

IDEQ should note that the new interpretation of the permit language places a severe burden on the rural community of Driggs Idaho. This interpretation requires a minimum of five vehicle trips to Idaho Falls per month, requiring an additional 15hrs/month. The City does not believe this is an efficient use of our limited resources or an environmentally responsible practice. Please note, the city currently only has 5 full time public works employees that are responsible for our water system, collection system, Wastewater Treatment Plant, transportation system and park system.

Furthermore, the city may not be able to comply with this interpretation through the winter months due to adverse road conditions and weather related road closures. During winter storms all roads in/out of Teton Valley are often closed which may affect our ability to meet the strict sampling timeline. Additionally, the City of Driggs will not put our employees at risk in dangerous driving conditions.

The city would like to work with IDEQ to develop a long-term solution to this revised interpretation of the permit which led to this violation, which meets the permit intent but does not inhibit our ability to maintain our infrastructure. One option we would like to explore with IDEQ is conducting the E.Coli tests in-house at our own laboratory. We would like IDEQ's input on what steps the City needs to take to conduct these tests in-house and be compliant with the permit. We look forward to your input and response.

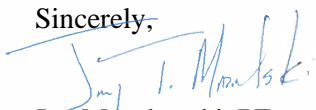
3. *3. Part I.B Table 1 of the Permit requires that the City collect and report a continuous flow for the influent to the treatment plant.*

It is a violation of the Permit that the City's influent flow meter is not functioning and the complete and correct amount of flow to the treatment plant is not being recorded. The permittee must take corrective action to address the malfunctioning flow meter by having the meter repaired. Documentation stating that the flow meter has been repair must be submitted to DEQ through the IPDES E-Permitting system by 12/20/2020.

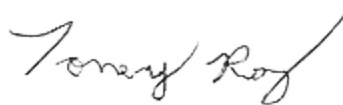
Corrective Action: The City has not had a flow meter at the influent flume since the re-construction of the plant in 2014. Influent flows have been measured from either A: summing flows from the lift stations or B: summing the flow from the mag-meters at the drum screens. Nevertheless, the city recognizes the value of this infrastructure, and has contracted with our SCADA consultant (SKM) to have flow measuring device installed at the Parshall Flume in the influent trough by December 20, 2020 at a cost of approximately \$8,000. We will notify IDEQ once the measuring device is installed.

The City of Driggs is committed to protecting the environment and being a good steward of Idaho's waters. If you have any question, comments, or concerns, please contact us.

Sincerely,



Jay Mazalewski, PE,
Director of Public Works



Toney Roy
Responsible Charge Operator

